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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JAN 26 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Telephone Number Portability

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CC Docket No. 95-116

COMMENTS OF SPRINT CORPORATION

On January 21, 1998, the Chairman of the North American Numbering Council (NANC) wrote to the Chief of the Common Carrier Bureau noting (p. 1) that the Commission's implementation schedule for local number portability deployment "will be significantly affected in the Southeast, Western and West Coast regions by vendor failure to provide a stable platform to support local number portability." The NANC therefore recommended that the Commission allow affected carriers until March 1, 1998 to make any necessary petitions for waiver of the rules requiring implementation of permanent local number portability in the top 100 MSAs by March 31, 1998. On January 21, 1998, the Commission released a Public Notice (DA 98-109) requesting comment on the NANC's recommendation.

Sprint Corporation supports a delay in the filing of waiver requests until March 1, 1998 for the limited and specific purpose of addressing the vendor problem in the three affected regions. By March 1, more information will be available as to the impact of the vendor failure and the possible solutions to this problem, and affected carriers will then be in a better position to evaluate their ability to meet the March 31, 1998 implementation deadline. Requiring the filing of waiver requests on the schedule specified by the Commission's rules (60 days in advance of the implementation deadline, *i.e.*, by January 29, 1998) would flood the Commission

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with paper offering little information beyond the fact that a problem exists with the current vendor, and would constitute a waste of Commission and industry resources.

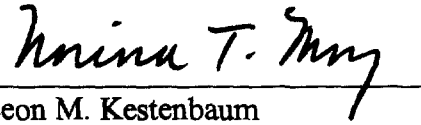
If the Commission accepts the NANC's recommendation and grants the requested 30 day extension of time, it must make clear that the delay applies only to those situations resulting from the vendor failure to provide the stable local number portability platform in the Southeast, Western and West Coast regions. Any carrier which cannot meet the March 31, 1998 LNP implementation date for any other reason, or in any region other than the 3 specified, must still file its request for waiver by January 29, 1998, and justify such waiver request with a complete and detailed explanation of the unique circumstances which prevent it from meeting the mandated implementation date.

If the Commission does decide to allow carriers to file requests for waiver on March 1, 1998 because of the vendor problem in the 3 affected regions, it also must make clear that such decision does not constitute a waiver of the March 31, 1998 local number portability implementation date, and in no way relaxes, eliminates or otherwise amends the standards a BOC must meet in order to be deemed in compliance with the local number portability Competitive Checklist requirement (Section 271(2)(B)(xi)). Waiver of the March 31 date cannot be made without careful review and consideration of waiver requests actually filed.¹

¹ Even if the Commission grants a waiver of the March 31, 1998 implementation date, such waiver obviously cannot be considered to be a waiver of the checklist item itself. A BOC may not rely upon grant of a waiver of the March 31 date as grounds for allowing it to provide in-region long distance service before it has deployed permanent local number portability capability under the revised schedule established by the Commission.

Respectfully submitted,

SPRINTCORPORATION

A handwritten signature in dark ink, reading "Norina T. Moy". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Leon M. Kestenbaum

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Norina T. Moy

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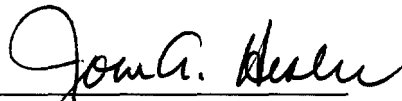
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January 26, 1998

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Comments of Sprint Corporation was Hand Delivered or sent by United States first-class mail, postage prepaid, on this the 26th day of January, 1998 to the below-listed parties:


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